

## Privacy at Legg Mason Australia

Legg Mason Asset Management Australia Limited (ABN 76 004 835 849, AFSL No. 240827) is part of Franklin Resources, Inc. (Legg Mason, we, us and our) respect and are committed to protecting your privacy. We are bound by, and comply with, the Privacy Act 1988 (Cth) (Privacy Act). This Privacy Policy explains the way we collect, maintain and handle your personal information. This Privacy Policy applies to Legg Mason only.

### 1. What personal information do we collect

During our activities, we collect and hold personal information about you. We will only collect personal information that is necessary to provide our products and services to you, including information needed to comply with legal and regulatory requirements.

We may collect the following types of personal information:

- name;
- email address, mailing address and other contact details;
- date of birth;
- information to verify your identity such as your driver's licence number;
- tax file number; and
- bank account details to enable payment of distributions or redemptions.

We are required to collect your name, address, date of birth and other verification information under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth). We are authorised to collect tax file numbers under tax laws and the Privacy Act.

#### How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- from your completion of application forms for our products;
- through your use of our website;
- during communications between you and our representatives; and
- from our conduct of marketing activities which may include requests for more information for example competitions, events or requesting 'business cards'

We may also collect personal information from third parties including your adviser or authorised representative.

If you are a contact of a corporate client or other organisation or an adviser within a dealer group, personal information may be collected from that entity.

#### What happens if we cannot collect your personal information?

If we do not obtain all the information we need from you, the following may happen:

- we may not be able to provide you with and subsequently administer some or all our products or services; and/or
- we may not be able to provide you with information about our products and services.

#### How is your personal information used?

We will only use your personal information for the purpose of providing you with our investment products and services. In managing your investment with us, we will use your personal information to:

- assess your application and provide our products and services to you;
- communicate with you in relation to your investment;
- monitor, audit, evaluate and otherwise administer our products and services;
- provide you with access to protected areas of our websites;
- provide continuous service to you and to conduct business processing functions including by providing personal information to our related bodies corporate, contractors, service providers or other third parties; and;

- assist with the administrative, marketing (including direct marketing), planning, product or service development, quality control or research purposes of Legg Mason and its contractors and service providers.

### 2. Direct Marketing

We may send you direct marketing communications and information about our products and services that we expect may be of interest to you. These communications may be sent in various forms, including mail, SMS and email. You consent to us sending you those direct marketing communications by any of those methods. At any time you may opt-out of receiving marketing communications from us by contacting us using the contact details below or by using the opt-out facilities provided in the marketing communications.

Please note that, if we are currently providing you with services or products, we will still need to send you essential information about your account, the relevant services or products and other information required by law.

### 3. With whom does Legg Mason Australia share your personal information?

To provide you with the services you require, and for the purposes set out above, we may disclose your personal information to third party organisations. We take reasonable steps to ensure that these third party organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

We may disclose your personal information to the following third parties:

- service providers, such as your financial adviser. If a financial adviser's stamp appears on your application form or if you otherwise inform us of having a financial adviser, we may supply your financial adviser with information about your accounts unless you instruct us otherwise in writing;
- other professional advisers such as accountants, lawyers, consultants and other business advisers as appointed by you and advised to us;
- mail houses, archive providers, our related bodies corporate, contractors, or other third parties for the purposes specified above; and
- other third parties where required, or allowed under law, or in connection with legal proceedings.

We will not sell your personal information to other organisations. Nor will we provide organisations outside the Legg Mason with your personal information for purposes unrelated to the management of your investment or the distribution of marketing materials.

We may also disclose your personal information to entities located overseas for one or more of the purposes set out above.

### 4. Is your personal information secure?

We invest considerable resources to keep your personal information secure from misuse, loss, interference, unauthorised access, modification or disclosure. Access to and the use of personal information is regulated to prevent misuse or unlawful disclosure of the information. We use security procedures such as encryption, firewalls, intrusion detection and anti-virus technology to prevent unauthorised access. We also use valid log-in identification and password based security to achieve electronic information security. We retain information for as long as may be necessary to respond to issues that may arise later, and longer where required by law. When personal information is no longer required by us, it is destroyed or de-identified.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal

information or other information which you transmit to us online is transmitted at your own risk.

## 5. How can you access your personal information?

You may contact us by using the details provided below and request access to your information. Before we give you access to information about you we will ask you to verify your identity. In normal circumstances we will give you full access to your information, however, at times there may be a legal reason why we must deny access, such as where granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If access is denied, we will give you the reasons for any refusal in writing and the mechanisms available to complain about the refusal.

## 6. How to correct your personal information

We will endeavour to ensure your personal information is kept accurate, complete, up to date and relevant. Please let us know if and when any of your details change.

If you believe that the personal information we store about you is incorrect, incomplete, inaccurate or misleading, you may ask us to amend it. If we do not agree that there are grounds for amendment, we will give you the reasons for any refusal in writing and the mechanisms available to complain about the refusal, and we will add a note to the personal information stating that you disagree with the information.

## 7. Dealing with Legg Mason online

We may use "cookies" to help us tailor our website to better suit your needs (e.g. we may use cookies to enable us to save any personal preferences indicated by you) and to provide a more effective route to various components of our website. If you choose to disable cookies, some of our website's functionality might be impaired. Cookies are small text files that are stored in your computer's memory and hard drive, in your mobile device or tablet when you visit certain websites. They are used to enable websites to function or to provide information to the owners of a website or other third parties which receive data obtained from that website. This information might be about you, your preferences or your device and is mostly used to make the website work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised online experience.

Cookies help us to provide customised services and information. We specifically use cookies to tell us, in general terms, how and when pages in our websites are visited, and to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our site. This information is collected to analyse and improve our website, our marketing campaigns and to record statistics on web traffic.

We may disclose details about the general use of our website to third parties – for example, to demonstrate patterns of use and other business partners. Information we pass on for this purpose will not include any personal data by which you may be identified.

## 8. How to complain about a breach of privacy?

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the Investigating Officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

If a complaint remains unresolved, you may access an external dispute resolution service (if applicable) or apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined.

When we write to you about our decision, we will explain how you may access an external dispute resolution scheme or make a complaint to the OAIC.

### Contact Us

If you have any queries or concerns about the privacy of your information, please contact our Privacy Officer via the following:

Phone: 1800 679 541

Email: [auclientadmin@leggmason.com](mailto:auclientadmin@leggmason.com)

Mail: PO Box 24011, Melbourne VIC 3001

Please address all written requests: 'Attention: Privacy Officer'.

### Changes to this Policy

We will review this policy from time to time and may update it at our discretion. This policy was last updated in May 2018.

**Legg Mason Asset Management Australia Limited, ABN 76 004 835 849, AFSL No. 240827 ("Legg Mason Australia") is part of Franklin Resources, Inc.**